

IN THE DISTRICT COURT OF KINGFISHER COUNTY  
STATE OF OKLAHOMA

Kingfisher County Oklahoma  
**FILED**

MAR 12 2021

RAW CRUDE OIL & GAS, LLC

Plaintiff,

v.

OVINTIV MID-CONTINENT, INC. and  
LIBERTY OILFIELD SERVICES, INC.,

Defendants.

LISA MARKUS, COURT CLERK  
BY:  DEPUTY

Case. No. CJ-2021-22

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**ORIGINAL PETITION**

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COMES NOW Plaintiff, Raw Crude Oil & Gas, LLC (“**Raw Crude**” or “**Plaintiff**”), and for its cause of action against the Defendants, Ovintiv Mid-Continent, Inc. (“**Ovintiv**”) and Liberty Oilfield Services, Inc. (“**Liberty**”) (together, “**Defendants**”), hereby states as follows:

JURISDICTION AND VENUE

1. This court has jurisdiction over the parties and subject matter of this action.
2. Venue is proper under Okla. Stat. tit. 12, § 131 (2) because the land and improvements thereon that were damaged are located in Kingfisher County, Oklahoma.

PARTIES

3. Plaintiff is a Domestic For-Profit Business Corporation.
4. Ovintiv is a Foreign Limited Liability Company authorized to do business in Oklahoma.
5. Liberty is a Domestic For-Profit Business Corporation.

BACKGROUND FACTS AND PLAINTIFF'S CLAIMS

6. Raw Crude is the operator of the following vertical well in Kingfisher County, Oklahoma (“**Plaintiff’s Well**”):

Name of Well:	Kayleen 1
API #:	073-24513
Surface Location:	Section 31, Township 17N, Range 8W

7. Oviniv is the operator of the following horizontal wells:

Name of Well:	Helen 1H-30X
API #:	073-25229

Name of Well:	Helen 1708 2H-30X
API #:	073-26260

Name of Well:	Helen 1708 3H-30X
API #:	073-26261

Name of Well:	Helen 1708 4H-30X
API #:	073-26262

Name of Well:	Helen 1708 5H-30X
API #:	073-26263

Name of Well:	Helen 1708 6H-30
API #:	073-26264

8. Oviniv and Liberty (via OneStim LLC, which became a part of Liberty early this year) together planned the completions of the Helen 1H-30X, Helen 1708 2H-30X, Helen 1708 3H-30X, Helen 1708 4H-30X, Helen 1708 5H-30X, and Helen 1708 6H-30X more specifically described in paragraph 7 (the six wells together, the “**Offending Wells**”). The laterals and bottom hole locations of the Offending Wells are near the wellbore of Plaintiff’s Well. As part of the completion process, the Offending Wells were fracked. The injection of fluids into the earth as a part of this fracking process has damaged Plaintiff’s Well and its ability to produce.

9. Defendants' fracs of the Offending Wells forced formation fluids and frac fluids into the wellbore of Plaintiff's Well.

10. The damage to the Plaintiff's Well was foreseeable by Defendants, and Defendants failed to use reasonable care in their frac of the Offending Wells to avoid such damage.


11. Defendants' fracs of the Offending Wells have caused Plaintiff inconvenience and annoyance and have interfered with Plaintiff's use and enjoyment of Plaintiff's Well.

12. Defendants' conduct constitutes a taking of Plaintiff's property, with respect to which, Plaintiff remains uncompensated and entitled to reasonable compensation from Defendants.

13. By its actions as set forth herein, Defendant acted in reckless disregard for Plaintiff's rights.

WHEREFORE, Plaintiff prays that judgment be entered in its favor and against Defendants for damages in an amount in excess of \$75,000, excluding interest and costs, and including physical damage to Plaintiff's Well, lost production, and Defendants' unconstitutional taking of Plaintiff's property; for nuisance damages in an amount to be determined at trial and at the discretion of the jury; for punitive damages; and for pre-judgment and post-judgment interest, costs, attorney fees as allowed by law, and all such other and further relief the Court deems just and proper.

Respectfully submitted,



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